

# EXHIBIT A

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

In re

CIRCUIT CITY STORES, INC., et al.,

Debtors.

Chapter 11

Case No. 08-35653 (KRH)

Jointly Administered

**DECLARATION OF ELIZABETH A. SUMMERER IN SUPPORT OF  
RESPONSE OF CATELLUS OPERATING LIMITED  
PARTNERSHIP TO LIQUIDATING TRUSTEE'S  
SEVENTEENTH OMNIBUS OBJECTION  
TO LANDLORD CLAIMS  
(Claim No. 13708 – Administrative Claim)**

I, Elizabeth Summerer, do hereby declare:

1. I am a Property Manager for ProLogis in El Segundo, California.

ProLogis is the parent company for Catellus Operating Limited Partnership which owned and operates the real property located at 501 South Cheryl Lane, City of Industry, California in which Circuit City operated a warehouse and distribution center (hereinafter, the "Premises").

During all relevant times, I was the Property Manager for the Premises and am familiar with the matters set forth herein and if called upon could competently testify thereto.

2. In the course of my duties as the Property Manager I calculated the 2008 CAM and property tax reconciliation for Circuit City under its lease with Catellus for the property commonly known as 501 South Cheryl Lane, City of Industry, California.

4. Under the terms of the Lease, Circuit City was required to pay estimated real property taxes on a monthly basis as additional rent subject to reconciliation for the actual real property taxes. To the extent there was an underpayment of estimated taxes, Circuit City

was liable for such payment. After the reconciliation for the year 2008, it was determined that Circuit City had underpaid the sum of \$65,052.71. The post-petition pro rata portion of that amount for the period from November 10, 2008 through December 31, 2008 is \$12,188.21 which is the amount asserted by Catellus as the additional property tax amount that accrued during the post-petition period.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 31 day of March, 2011 at El Segundo, California.

  
Elizabeth A. Summerer